



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary

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October 27, 2005

Mr. Thomas Knippel, President
Wisconsin Institute of Scrap Recycling Industries
240 W. Arndt Street
Fond Du Lac, WI 54936

Mr. Dave Smith, President
Concerned Auto Recyclers of Wisconsin DNR
2026 Hwy A
West Bend, WI 53090

Subject: Wisconsin DNR Position on Waste Tire Disposal

Dear Mr. Knippel and Mr. Smith:

Over the past several years the scrap and auto recycling industries and DNR have developed a positive relationship that focuses on environmental gains and economic stability for this industry. The purpose of this letter is to respond to questions we have received recently concerning waste tires that are still attached to vehicles prior to being crushed or shredded.

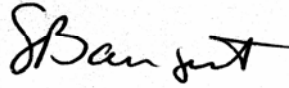
As you may know, state statutes prohibit waste tires, defined in s. 289.55(1)(c), Wis. Stats., from being landfilled in a solid waste disposal facility as outlined in s. 287.07(3), Wis. Stats.. Waste tires attached to vehicles and shredded at scrap processing facilities ultimately are landfilled. While the Department understands that incidental shredding of waste tires that cannot reasonably be removed from an automobile may occur at these facilities, intentionally allowing waste tires attached to or inside a vehicle prior to crushing or shredding is not considered an acceptable industry practice that we would consider as being in compliance with the landfill ban.

We realize that there are some circumstances when removal of the vehicle rim and the waste tire cannot be accomplished without having specialized equipment that may not be available at a scrap processing facility and/or auto recycler. **Therefore, waste tires that remain on a vehicle rim that cannot reasonably be removed from the vehicle using standard automotive rim removal equipment in preparation for processing, may be shredded and landfilled. However, failure to remove accessible tires, using standard vehicle rim and tire removal equipment prior to crushing or shredding of automobiles, is not considered an acceptable industry practice and would not be considered as being in compliance with the landfill ban. We ask that you promote the removal of all waste tires, including the spares, as a standard industry practice, and that you include this as part of your Environmental Management System(EMS) and audit your suppliers to support this practice.**

Please share this with your members with the goal of continuing to work together in resolving these and other issues the industry may face in the future.

We anticipate both the industry and DNR will continue to work together to achieve best management practices. Please contact me at (608) 266-0014 or Mark Harings (DNR Sector Specialist) at (715) 831- 3263 if you have further questions on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Bangert". The signature is fluid and cursive, with a large initial "S" and a stylized "Bangert" following.

Suzanne Bangert, Director
Bureau of Waste Management

cc: Frank Schultz SER/Hdqrs
Mark Harings WCR/Eau Claire
Paul Koziar WA/CO
Waste Management Team